

UNITED BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

RE: )  
 ) Case No: 16-10643 C-13G  
BRENDA J HUGHES )  
 )  
Debtors )

**OBJECTION TO CLAIM OF**  
**MTGLQ INVESTORS, LP**

COMES NOW, Brenda J Hughes, the Debtor herein, by and through counsel of record, and hereby objects to the allowance of the claim by MTGLQ Investors, LP hereinafter referred to as "Creditor" in the amount of fifty six thousand thirty two dollars and forty six cents, \$56,032.46., upon the following grounds:

1. The debtor filed a Chapter 13 petition on June 24, 2016 in this District, the case was subsequently confirmed and the debtor is presently current on her Chapter 13 Payments.
2. The creditor was listed on the debtor's petition.
3. The Creditor filed a claim in the amount of \$56,032.46 indexed as Claim Number 2 in the present case and listed the claim as secured. Upon information and belief the security is for real property which the debtor conveyed to Jeffery Scott Hughes and Pamela Hughes Miller in Book 1722 Page 2434 on July 27<sup>th</sup>, 2001 which is prior to the Deed of Trust Creditor filed as the basis for secured status in the present Chapter 13 case. A copy of the deed is attached hereto as Exhibit "a".
4. The debtor through information and belief does not believe she owns any real property and the claim cannot be allowed as a secured claim.
5. The creditor instituted an action in Randolph County, North Carolina to reform the Deed in case number 16 CVS 1000 on or about May 16, 2016, upon information and belief the Creditor never concluded that action. A copy of the complaint and answer are attached hereto and incorporated by reference as debtor's exhibit "b".

WHEREFORE, the debtor prays:

1. the debtor requests this claim be denied.
2. for such other and further relief as to the Court may deem just and proper.

This the 26th day of October, 2016.

/s/ Ronald A. Anderson  
Ronald A. Anderson, Bar No. 24920  
Attorney for Debtor  
Post Office Box 14639  
Archdale, NC 27263  
Phone: (336) 431-7336

UNITED BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

RE: )  
 ) Case No.: 16-10643 Chapter 13  
BRENDA J HUGHES )  
 )  
Debtors )

CERTIFICATE OF SERVICE

I, Ronald A Anderson, attorney hereby certifies that I have this date served the foregoing **Objection to claim of MTGLQ Investors, L.P.**, by depositing a copy thereof in the United States Mail, Postage paid properly addressed to the following parties in interest, at their last known addresses as shown below, in a post office or official depository under the exclusive care and custody of the United States Postal Service.

William Miller (sent electronically)  
US Bankruptcy Administrator  
101 South Edgeworth Street  
Greensboro, NC 27402

Chapter 13 Office (sent electronically)  
Anita Jo Kinlaw Troxler  
PO Box 1720  
Greensboro NC 27402-1720

MTGLQ Investors, L.P.  
c/o Rushmore Loan Management Services, LLC  
PO Box 55004  
Irvine, CA 92619

The Law Offices of Rick D Lail  
PO Box 30081  
Charlotte NC 28230

This the 26th day of October, 2016.

/s/ Ronald A. Anderson  
Ronald A. Anderson, Bar No. 24920  
Attorney for Debtor  
Post Office Box 14639  
Archdale, NC 27263  
Phone: (336)431-7336